

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RICHARD GOLDEN and BEAK & BUMPER, LLC, Judgment Creditors,)	
)	
vs.)	Case No. 1:16-cv-2440
)	
JANG H. LIM, Doing business as Dental USA, Inc., Judgment Debtor,)	District Judge: Honorable Andrea R. Wood
)	
And)	Magistrate Judge: Honorable Maria Valdez
)	
POWER DENTAL U.S.A., INC.)	
)	
Third Party Respondent.)	

MOTION FOR ENTRY OF CONDITIONAL JUDGMENT

Judgment Creditors Richard Golden and Beak & Bumper, LLC (the “Plaintiffs”), by their attorneys, pursuant to 28 USC § 3201 and 735 ILCS 5/2-1402 et seq. for their Motion for Entry of Conditional Judgment against Third Party Citation Respondent Power Dental U.S.A., Inc., states as follows:

1. On February 10, 2016, the United States District Court for the Eastern District of Michigan entered judgment in favor of Plaintiffs and against Defendant Jang H. Lim d/b/a Dental USA, Inc. (“Defendant”) in the matter captioned Richard Golden, et al v Jang H. Lim d/b/a Dental USA, Inc., Case No. 2:15-cv-10795 (see “Judgment”, a certified copy of which is attached hereto as **Exhibit A**). The Judgment granted Plaintiff’s Omnibus Petition to Confirm and confirmed the arbitrator’s May 8, 2015 Final Award to Plaintiffs in the amount of \$1,264,745.59 (see Arbitrator’s May 8, 2015 Final Award attached hereto as **Exhibit B**)

2. On February 19, 2016, Plaintiffs registered the Judgment in this District (see Doc #1).

3. Interest upon the Judgment continues to accrue from the judgment date pursuant to 28 USC §1961(a).

4. On August 1, 2016, a Citation (**Exhibit C**) was served upon Power Dental U.S.A., Inc. The Proof of Service is on file with this Court and is attached hereto as **Exhibit D**.

5. Power Dental U.S.A., Inc. has refused or neglected to produce or otherwise appear as required by the Citation.

6. Pursuant to 735 ILCS 5/2-1402 the Court may enter any order upon or judgment against the person cited that could be entered in any garnishment proceeding.

7. A Conditional Judgment (see proposed Order attached as **Exhibit E**) should be entered against Power Dental U.S.A., Inc. and a Summons to Confirm the Judgment against Power Dental U.S.A., Inc.

WHEREFORE, Richard Golden and Beak & Bumper, LLC respectfully request that this Court enter the Conditional Judgment against Power Dental U.S.A., Inc and issue a summons to confirm the conditional judgment against Power Dental U.S.A., Inc. in the amount of \$1,264,745.59 and for such other and further relief as this Court deems just.

Respectfully submitted,

**RICHARD GOLDEN AND
BEAK & BUMPER, LLC**

By: /s/ Thomas L. Stroble

Dated: November 11, 2016

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